

Amendments to the Drawings:

The attached replacement sheets of drawings includes changes to Figs. 3 and 4 and replaces the original sheets including Figs. 3 and 4. In addition, a new sheet of drawing includes new Fig. 5.

In amended Figs. 3, 4 and 5, a circulation system 380 is illustrated. The circulation system 380 includes a heater 364, a filter 362, a water jet 366, connectors 368 and pipes/tubes 370. In addition, in amended Fig. 4, suction 455 is renumbered as 448 and pressure 455 is renumbered as 452

Attachments following last page of this Amendment:

Replacement Sheet (2 pages)

New Sheet (1 page)

### REMARKS

Claims 1-28 were pending before amendment. Claims 2, 10, 11, 15, 20, 21 and 28 have been cancelled without prejudice. Claims 1, 3-7, 12, 13, 14, 17, 18, 19, 23, 24, 25 and 27 have been amended. New claims 29-30 have been added. No new matter has been added.

In light of the amendment and the following remarks, reconsideration and notice of allowance are respectfully requested.

#### Applicant Initiated Interview

Applicant thanks Examiner Koczo Jr. for the interview conducted on June 7, 2007 with Applicant's representative, Hwa Lee. Mr. Lee argued that the "hygienic self-priming centrifugal pump" and the "liquid ring pump section" in Sutton do not pump air and/or water out of each other, and that only the liquid ring pump section is able to pump air out of the centrifugal pump. Mr. Lee also argued that the "hygienic self-priming centrifugal pump" and the "liquid ring pump section" in Sutton are not physically separate pumps. Further, Mr. Lee argued that the systems in Sutton, Fabry and Allen fail to include a tube that "provides a fluid path separate from the inlets and the outlets." An agreement was not reached.

#### Objections to the Drawings

The drawings stand objected to for allegedly failing to show every feature of the invention specified in the claims. In particular, the drawings are objected to for allegedly failing to show the structures of claims 9, 11, 21, 22, 24 and 26.

A replacement sheet of drawings are submitted in this paper to obviate the objections. No new matter has been added since amendment to the drawings merely illustrate the structural features recited in original claims 1, 9, 11, 21, 22, 25 and 26.

Rejections Under 35 U.S.C. § 112

Claims 11, 19, 21 and 23 stand rejected under 35 U.S.C. § 112, 2<sup>nd</sup> ¶ for allegedly being indefinite.

In particular, claims 11 and 21 are rejected for allegedly failing to provide a reference frame for “top portion.” Claims 11 and 21 have been amended to obviate the rejections.

Claim 19 is rejected for allegedly failing to recite a method step for causing the pumps to self-prime. Claim 19 has been amended to obviate the rejection.

Claim 23 is rejected for allegedly failing to recite a method step. Claim 23 has been amended to obviate the rejection.

Rejections Under 35 U.S.C. § 102

Claims 1-3, 5-10, 12, 13, 17-20, 22 and 23 stand rejected under 35 U.S.C. § 102(a) as allegedly being anticipated by U.S. Patent No. 6,585,493 to Sutton. This contention is respectfully traversed.

Sutton fails to teach or suggest each and every feature of amended claim 1. In particular, Sutton fails to teach or suggest the claimed “first pump” and “second pump” that are physically separate. In contrast, Sutton teaches a single attached unit that includes a “hygienic self-priming centrifugal pump” and a “liquid ring pump section 9.” (*See*, Sutton at Col. 3, l. 63 – Col. 4, l. 16 and FIG. 1.) The liquid ring pump section 9 comprises a pump screw 11, which is mounted on and in extension of the hub 7a, which is mounted on the shaft 14 of the centrifugal pump. (*See*, Sutton at Col. 4, ll. 1-6, and FIG. 1.) Thus, the liquid ring pump section in Sutton is clearly connected to, and part of the centrifugal pump. Further, Sutton fails to teach or suggest “a tube” that “provides a fluid path separate from the inlets and the outlets” as recited in claim 1. Thus, Sutton fails to teach or suggest each and every structural feature of the system recited in claim 1.

For at least these reasons, claim 1 is allowable over Sutton. Claims 12, 17 and 23 are allowable over Sutton for at least reasons similar to claim 1. Claims 3 and 5-9 depend from claim 1, and are allowable over Sutton for at least the same reasons. Claim 13 depends from

claim 12, and is allowable over Sutton for at least the same reasons. Claims 18-19 and 22 depend from claim 17, and are allowable over Sutton for at least the same reasons.

In addition, claims 1, 2, 5-10, 12, 14-17, 19, 20, 22 and 23 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 7,044,716 to Fabry ("Fabry"). This contention is respectfully traversed.

Fabry fails to teach or suggest each and every features of claim 1. Fabry teaches a "high-pressure centrifugal compressor" that includes various "compressor elements." These compression elements are designed to enable flow of compressed gas "by splitting the high-pressure stage in two stages." (*See*, col. 4, ll. 24-65; FIGURE.). The compressor elements in Fabry fails to include "an inlet" that "suctions at least water into the first pump" and "an outlet" that "pushes at least water away from the first pump." In addition, Fabry fails to teach or suggest "a tube" that "provides a fluid path separate from the inlets and the outlets" as recited in claim 1. In contrast, Fabry merely discloses compressed air lines (e.g., 11, 12), which cannot reasonably be interpreted as "a fluid path separate from the inlets and the outlets" as recited in claim 1.

For at least these reasons, claim 1 is allowable over Fabry. Claims 12, 17 and 23 are allowable over Fabry for at least reasons similar to claim 1. Claims 5-9 depend from claim 1, and are allowable over Fabry for at least the same reasons. Claims 14 and 16 depend from claim 12, and are allowable over Fabry for at least the same reasons. Claims 19 and 22 depend from claim 17, and are allowable over Fabry for at least the same reasons.

#### Rejections Under 35 U.S.C. § 103

Claim 4 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sutton. Claim 4 depends from claim 1, and is allowable over Sutton for at least the reasons similar to claim 1.

Claims 24 – 28 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,422,014 to Allen et. al. ("Allen") in view of Sutton.

Claims 24-28 depend from claim 23, and are allowable over Sutton for at least the same reasons. The addition of Allen fails to alleviate the deficiencies of Sutton. In particular, similar

to Sutton, Allen also fails to disclose a “first pump” and a “second pump” that are physically separate. In contrast, the system in Allen includes a single pump. (*See*, Allen at FIG. 1, No. 50.) In addition, Allen also fails to disclose other claimed structural features such as the claimed “tube” that “provides a fluid path separate from the inlets and the outlets”. Thus, even if Allen and Sutton were able to be combined (which is not conceded), a hypothetical combination of Allen and Sutton would still fail to teach or suggest each and every feature of claims 24-28.

For at least these reasons, claims 24-28 are allowable over the proposed combination of Allen and Sutton.

#### New Claims 29-30

Claims 29 and 30 depend from claims 1 and 17 respectively, and are allowable over the prior art of record for at least reasons similar to claims 1 and 17.

### CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific issue or comment does not signify agreement with or concession of that issue or comment. Because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

It is respectfully suggested for all of these reasons, that the current rejections are overcome, that none of the cited art teaches or suggests the features which are claimed, and therefore that all of these claims should be in condition for allowance. A formal notice of allowance is thus respectfully requested.

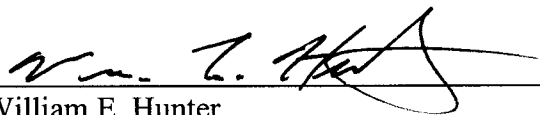
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Please apply three month extension of time fee and any charges or credits to Deposit  
Account No. 06 1050.

Respectfully submitted,

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